

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUAN LOPEZ,
*on behalf of himself, FLSA Collective Plaintiffs
and the Class,*

Plaintiff,

-against-

Case No.: 1:20-cv-09113

THERMO TECH MECHANICAL, INC.,
GOWKARRAN BUDHU, and SHANTI BUDHU,

Defendants.

DECLARATION OF C.K. LEE, ESQ.

I, C.K. Lee, under penalty of perjury, affirm as follows:

1. My name is C.K. Lee, and I am a member of Lee Litigation Group, PLLC, Plaintiff's counsel in the above-captioned matter.

2. I submit this declaration in support of Plaintiff's Motion for Class Certification pursuant to Fed. R. Civ. P. 23.

3. Lee Litigation Group, PLLC is a law firm with significant experience with employee rights. Specifically, the firm has represented hundreds of individual employees in wage and hour matters.

4. Since graduating University of Pennsylvania Law School in 1997, I was associated with several major international firms, including Clifford Chance, Morrison & Foerster and Schulte Roth & Zabel.

5. I was admitted to the New York bar in 1998. I am also admitted to the bars of the Second Circuit Court of Appeals and the United States District Courts for the Northern, Western,

Eastern and Southern Districts of New York. I am a member in good standing of each of these bars.

6. My personal current docket involves class action lawsuits against New York City business establishments, among others, for wage and hour violations.

7. As a result of these lawsuits, I have recovered significant sums of money for a number of New York City employees.

8. Lee Litigation Group, PLLC is willing and able to commit the necessary resources to represent the class.

9. Attached hereto as **Exhibit 1** hereto is a copy of the proposed notice to class members.

10. Attached hereto as **Exhibit 2** is a true and correct copy of the deposition transcript for Defendant Gowkarran Budhu, dated September 28, 2023.

11. Attached hereto as **Exhibit 3** are true and correct copies of Plaintiff's timesheets for 2016, produced by Defendants.

12. Attached hereto as **Exhibit 4** are true and correct copies of Plaintiff's timesheets for 2017, produced by Defendants.

13. Attached hereto as **Exhibit 5** are true and correct copies of Plaintiff's timesheets for 2018, produced by Defendants.

14. Attached hereto as **Exhibit 6** are true and correct copies of a sampling of Class Members' time sheets from 2016 – 2020, showing Defendants' unlawful rounding.

15. Attached hereto as **Exhibit 7** is a true and correct copy of a spreadsheet illustrating a sampling of deficiencies in Defendants' production of time sheets and wage statements for Plaintiff and Class Members.

16. Attached hereto as **Exhibit 8** are true and correct copies of a sampling of Defendants' company-wide weekly payroll data for 2016, 2017, 2019, and 2020.

17. Attached hereto as **Exhibit 9** are true and correct copies of a sampling of a sampling Defendants' production of Class Members' time sheets showing Defendants' meal break time shaving of 1 hour or less.

18. Attached hereto as **Exhibit 10** are true and correct copies of a sampling of a sampling Defendants' production of Class Members' time sheets showing Defendants' meal break time shaving of more than 1 hour.

19. Attached hereto as **Exhibit 11** are true and correct copies of a sampling of a sampling Defendants' production of Class Members' time sheets showing Defendants' failure to pay all prevailing wages due.

20. Attached hereto as **Exhibit 12** is a true and correct copy of Defendants' Company Insurance Policy Schedule for 2019.

21. During the last ten years, I have served as lead counsel in numerous wage and hour class and collective actions. Attached as **Exhibit 13** is a true and correct list of class and collective action cases where I have served as lead counsel.

I affirm, under penalty of perjury, that the above and foregoing information is true and correct.

Dated: New York, New York
December 1, 2023

Respectfully submitted,

By: /s/ C.K. Lee
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